

#### **Department of Energy**

ROCKY FLATS FIELD OFFICE P O BOX 928 GOLDEN, COLORADO 80402-0928

MAR - 1 2000

00-DOE-01595

Mr Steve Gunderson Rocky Flats Cleanup Agreement Project Coordinator Hazardous Materials and Waste Management Division Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80222-1530

Dear Mr Gunderson

Enclosed please find a minor modification to the final Building 776/777 Decommissioning Operations Plan (DOP) This minor modification is being submitted in accordance with Section 4 5 2 of the DOP and Paragraph 127 of the Rocky Flats Cleanup Agreement (RFCA) The modification includes Resource Conservation and Recovery Act (RCRA) unit-specific closure information for RCRA units located in Sets 7, 11, 26 and 61

Per Paragraph 127 of RFCA, a timeframe of seven days is set for review and approval of minor modifications. Therefore, I ask that your agency review the enclosed information and provide your final approval of the modification within seven days of receipt of this letter.

Thank you for your consideration in this matter Please call me at 303-966-5918 or Sandi MacLeod at 303-966-3367 if you have any questions or need more information

Sincerely,

Joseph A Legare

Assistant Manager for

Environment and Infrastructure

#### Enclosure

cc w/Encl

E Kray, CDPHE

T Rehder, EPA

M Aguilar, EPA

S MacLeod, FCG, RFFO

G Schuetz, FCG, RFFO

R DıSalvo, OCC, RFFO

Administrative Record



ADMIN RECORD

A- B776-A-00006

1/12

cc w/o Encl

D Grosek, EI, RFFO

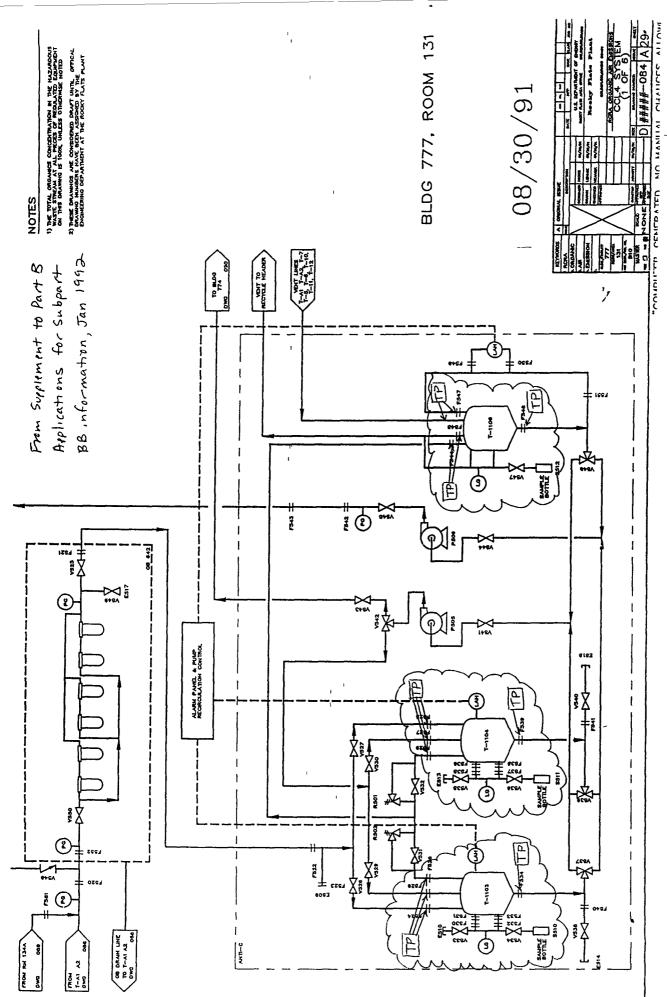
D Shelton, K-H

R Walker, K-H

A Parker, K-H

SET#	RCRA Unit #(s)	Description	Regulatory Signification	Closure Status
7	95.006	Mixed Residue Tank 1103	Mixed Residue	RCRA Stable/Physically Empty
	95.007	Mixed Residue Tank 1104	Mixed Residue	RCRA Stable/Physically Empty
	95.008	Mixed Residue Tank 1106	Mixed Residue	RCRA Stable/Physically Empty

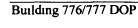
Unit Description.	Tanks 1103, 1104, and 1106 were installed in Room 131 of Building 777 in 1972. These raschig-ring tanks were used to store contaminated organic waste, which was transferred via pipeline to Building 774 for treatment. The waste was primarily used machining coolant (predominately 643 light hydraulic oil) with spent carbon tetrachloride solvent, along with smaller amounts of Freon TF (1,1,2-trichloro-1,2,2-trifluoroethane), vacuum pump oil, and sight gauge oil. Other liquids included 645 heavy grade hydraulic oil, 10W-30 &10W-40 motor oil, perchloroethylene, spray mist oil, vacuum pump exhaust condensate, and 689 criticality drain fluid.
	In addition, liquids originating from a series of five pencil tanks (T-5, T-6, T-10, T-11, and T-12) in Room 134 were filtered in Glovebox 642, then transferred to Tank 1104 After sampling and additional filtering (as necessary), the waste liquid was pumped into Tank 1103 for confirmatory sampling in preparation for pipeline transfer to Building 774 Tank 1106 was an overflow tank that connected to Tanks 1103 and 1104
	All three tanks were drained, raschig rings removed, process waste lines disconnected, and blank flanges installed in August and September of 1998
Unit Boundaries and Interfaces:	RCRA Units 95 006, 95 007, and 95 008 are connected to ancillary equipment that will be removed during the decommissioning of SET 8 (piping in Room 131), SET 6 (Glovebox 642), and SET 78 (miscellaneous piping over eight feet) This closure activity is limited to removal of the tanks themselves The ancillary piping and glovebox will be removed at a later date. The attached drawing shows a schematic of the tanks and ancillary equipment, with the approximate termination points (TPs)
EPA Waste Codes	D006, D007, D008, D019, F001, F002
Selected Closure Option	Unit removal without onsite treatment
Closure Requirements	This closure activity will include disconnecting the tanks from the Zone I exhaust system, disconnecting the legs of the tanks, size-reducing the tanks in place or in a central size reduction facility (as necessary), and packaging the tanks for offsite disposal
Waste Disposal	If residual liquids are present, they will be absorbed The tanks will be disposed of as mixed waste. Upon final radiological characterization, the tanks will be packaged to meet the waste acceptance criteria (WAC) of the approved disposal facility. Hoisting and rigging equipment will be used to facilitate transport to a size reduction facility, if necessary. In the event this waste cannot be shipped directly to the approved disposal facility, it will be stored in an approved onsite storage unit until shipment can be scheduled.

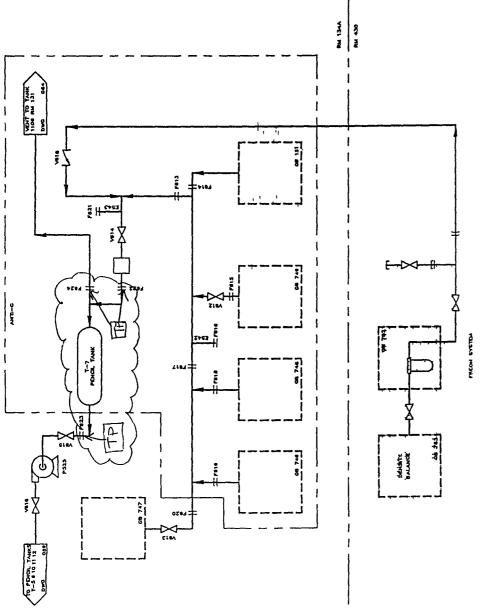


Building 776/777, SET 7 Tanks 1103, 1104, 1106 (RCRA Units 95.006, 95.007, 95.008) Modification #3

2 of 11

SET#	RCRA Unit #(s)	<b>Description</b>	Regulatory Status	Closure Seaus.				
11	95.014	Pencil Tank T-7	Mixed Residue	RCRA Stable/Physically Empty				
Unit Desc	ription.	Pencil Tank T-7 is located in Room 134E in Building 777 T-7 was used as a surge tank, which collected waste oils, coolants, and carbon tetrachloride from machining processes located in the gloveboxes in Room 134E, and freon from the density balance located in Glovebox 763 in Room 430 From T-7, the waste was transferred to a series of five pencil tanks (T-5, T-6, T-10, T-11, and T-12) in Room 134 The waste from the five pencil tanks was then transferred to Tank 1104 in Room 131 (SET 7) Tank T-7 is vented to Tank 1106 in Room 131						
		T-7 was drained and isolated in 1997, when the five pencil tanks were closed as part of Mixed Residue Pencil Tank Closure Project #2						
Unit Bour Interfaces	ndaries and	RCRA Unit 95 014 includes Tank T-7 and associated ancillary equipment in Room 134E. The attached drawing shows a schematic of the tank and ancillary equipment. This closure activity is limited to the removal of T-7, only. The associated ancillary piping will be removed with Gloveboxes 746, 747, 748, 749 and associated M-lines, and mixed residue vacuum accumulators V-746, V-747, V-748, and V-749, at a later time						
EPA Was	te Codes:	D006, D007, D008, D019, F001, F002						
Selected (Option:	Closure	Unit removal without onsite treatment						
Closure Requirem	ents:	The work effort will include disconnecting the tank from the vent line and the inlet and outlet piping, installing blank flanges on the lines remaining, size-reducing the tank (if necessary), and packaging the tank for offsite disposal						
Waste Dis	sposal:	mixed waste Upon the waste acceptance waste cannot be ship	is are present, they will be absorbed. The tank will be disposed of as pon final radiological characterization, the tank will be packaged to meet ance criteria (WAC) of the approved disposal facility. In the event this shipped directly to the approved disposal facility, it will be stored in an storage area until shipment can be scheduled.					





Fram Supplement to Port B Permit Applications for subject BB information, January 1992

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Building 776/777, SET 11 Pencil Tank T-7 RCRA Unit 95.014

SET #	RCRA Unit #(s)	Description	Regulatory Status	Closure Status			
26	95.015 95.016	Holding Tank T-1 Holding Tank T-2	Mixed Residue Mixed Residue	Physically Empty Physically Empty			
Unit Desc	eription.	steel, raschig-ring tanks 150 gallons and 170 gal were used to collect wa gloveboxes in Building Building 707 The was Glovebox FL-1, and tra to an overhead line, who	s were built in 1969, and had ap illons respectively (subtracting t ste 1,1,1-trichloroethane (TCA) 777 (Rooms 430, 437, 440, and te TCA from both buildings wa nsferred to Tank T-2 From Tan	d 452), and from Tank V-100 in is collected in Tank T-1, filtered in ink T-2, the waste TCA was pumped I line, which was used to transfer oil			
		The raschig rings were removed from both tanks in January 2000 No residual liquid or sludge was present. The ancillary pumps, filters in Glovebox FL-1, and the inlet piping back to the first valves above the tanks were also drained and removed at that time The outlet piping from Tank T-2 to the tie-in with the waste oil/coolant piping was drained and removed in July 1998 The remaining ancillary inlet piping that connected Tanks T-1 and T-2 to waste sources in Building 777 (Rooms 430, 437, 440, and 452), and to Tank V-100 in Building 707, has not been drained.					
Unit Boui Interfaces	idaries and	RCRA Units 95 015 and 95 016 consist of Holding Tanks T-1 and T-2 and associated ancillary equipment, including Glovebox FL-1, piping located inside Glovebox FL-1, and the remaining inlet piping that connected Tanks T-1 and T-2 to waste sources in Buildings 777 and 707 The attached drawings show Tanks T-1 and T-2, and a schematic of the tanks and ancillary equipment.					
EPA Was	te Codes:	F001, F002					
Selected C	Closure	Tanks and ancillary pipi	ing Unit removal without onsit	e treatment.			
Option.		Glovebox FL-1 Unit removal in conjunction with "debris rule" treatment (i e, either water washing/spraying or liquid phase solvent)					
Closure Requirem	ents:	This closure activity includes (1) removal, size reduction (if necessary), and packaging of Tanks T-1 and T-2, the vent line connecting each tank to Glovebox FL-1, and the ancillary piping inside Glovebox FL-1, and (2) "debris rule" treatment, removal, size reduction (if necessary), and packaging of Glovebox FL-1					
		The remainder of the ancillary inlet piping that connected Tanks T-1 and T-2 to waste sources in Building 777 and 707 will be removed during the decommissioning of SET 29 (piping in Room 437), SET 27 (piping in Room 440), SET 35 (piping in Room 452), and SET 78 (miscellaneous piping over eight feet)					
Waste Dis	posal.	The tanks will be disposed of as mixed waste If, after "debris rule" treatment, Glovebox FL-1 meets the standard for a "clean debris surface," and it does not exhibit a hazardous waste characteristic, it will be disposed of as solid waste. If not, it will be disposed of as mixed waste.					
		Upon final radiological characterization, the tanks will be packaged to meet the waste acceptance criteria (WAC) of the approved disposal facility. In the event this waste cannot be shipped directly to the approved disposal facility, it will be stored in an approved onsite storage area until shipment can be scheduled.					

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Building 776/777, SET 26 Holding Tank T-1 RCRA Units 95.015

6 of 11

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	I ANK INFORMATION TABLE
MATERIAL OF CONSTRUCTIONS	\$700
WASTE CONTA YED!	RICHOROTHAE
OVERALL DIRENGIONS	29.22.25
CAMCITY (CL.)	170
SPELL THICOGESS:	115
MAT MAM LIQUID LENGT	159
SPECIFIC CRANTES	
STRUCTURAL SUPPORTS	(4) FANCE
TEM OF CONSTRUCTIONS	961
SCALL TIPE:	M200
OPDIATING PRESSURES	ATMOSPERIC
OPERATING TEMPERATURE:	Melori
DESIGN PRESE, AE:	
DESIGN TEMPTRATURE	

PLAN

for TRU Mixed wastes, July 1988

From Part B Permit Application

ELEV

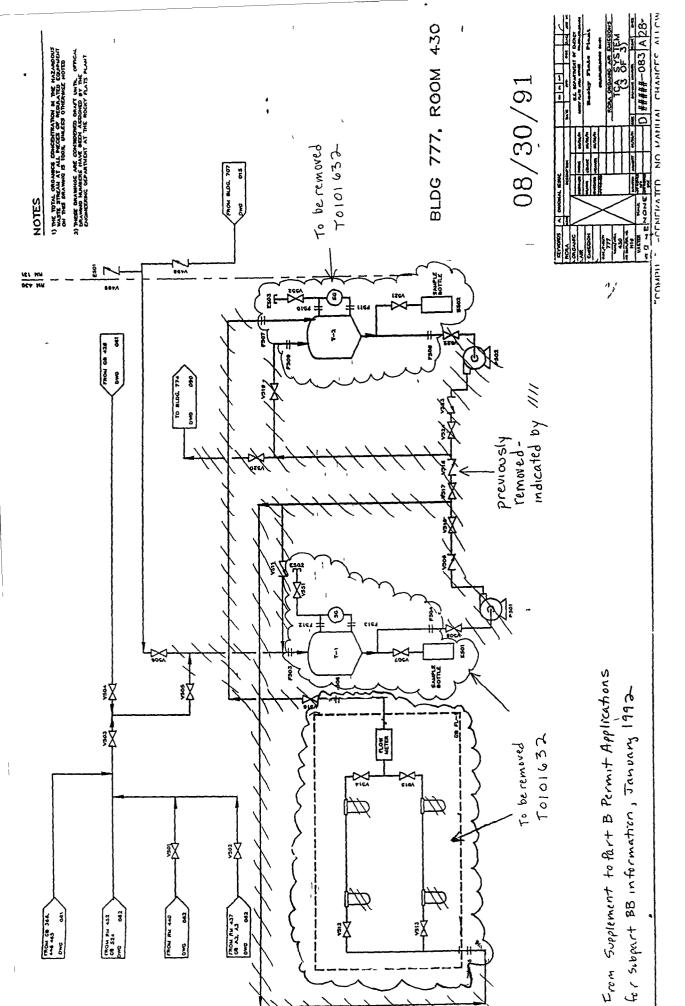
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Building 776/777, SET 26 Holding Tank T-2 RCRA Unit 95.016

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7 of 11

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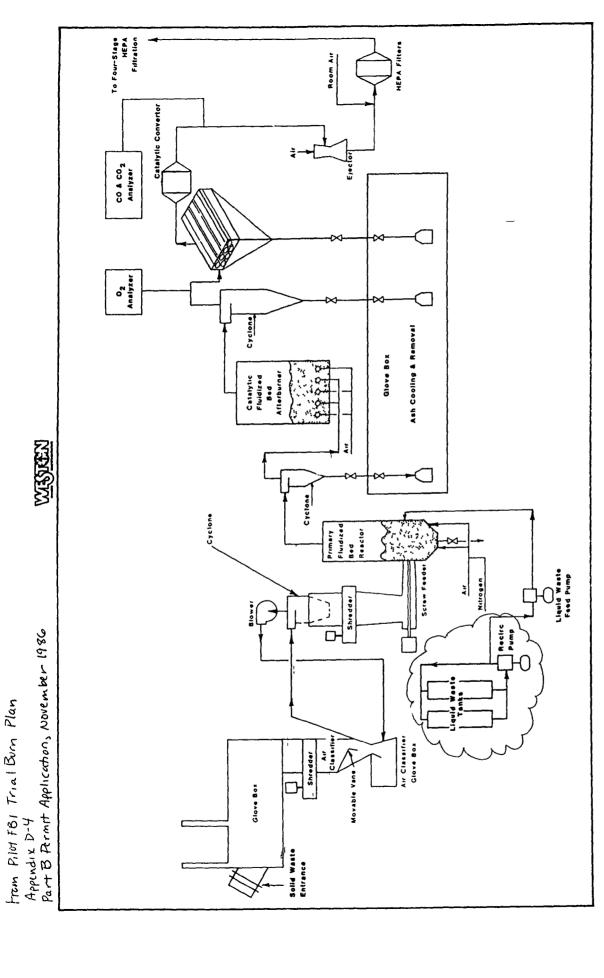
RCRA Units 95.015 and 95.016 Building 776/777, SET 26 Holding Tanks T-1 and T-2

Modification #3

8 of 11

SET#	RCRA Unit #(s)	Description	Regulatory Status	Closure Status
61	49.02	Pencil Tank T-1	Interim Status	RCRA Stable
		Pencil Tank T-2	Interim Status	RCRA Stable

Unit Description:	Pencil Tanks T-1 and T-2 in Room 134 were used as feed tanks for the Pilot Fluidized Bed Incinerator (FBI) They are six-inch diameter stainless steel tanks, with capacities of approximately eight gallons each. Liquid wastes were received in 55-gallon drums and pumped through a filter into the pencil tanks. The liquid was mixed by pumping it through a recirculation loop with a Sandpiper double diaphragm pump. A variable displacement metering pump was used to deliver the liquid waste to the primary reactor in the incinerator chamber.  Pencil Tanks T-1 and T-2 have contained various organic solvents, degreasing fluids, lubricating oils, cutting oils, and other oil/solvent wastes from laboratories and production areas at Rocky Flats. Methanol was used during start-up to bring the incinerator up to operating temperature. An EPA-approved trial burn for PCBs was conducted in the pilot FBI in May 1981 using a feed comprised of 25 weight percent pyranol A13B3B3 (PCB transformer fluid) and 75 weight percent kerosene (Conoco LPA solvent). The test burn
	achieved a 99 9999 percent destruction efficiency
	The tanks were drained in May 1996 and the tank piping was locked/tagged out
Unit Boundaries and Interfaces:	RCRA Unit 49 02 includes the FBI Pilot Unit, Pencil Tanks T-1 and T-2, and associated ancillary equipment. The pencil tanks, Sandpiper pump, two filters, and some ancillary piping are located in Room 134 Additional filters and the metering pump are located in Room 135 outside the incinerator canyon, and the pilot FBI unit and feed lines are located inside the incinerator canyon. The attached drawings show a schematic of the entire system and a schematic of the tanks and ancillary equipment.
	This closure activity includes removal of the pencil tanks, Sandpiper pump, filters, and ancillary piping in Room 134 only. The piping will be capped at the wall between rooms 134 and 135. The FBI Pilot Unit will be removed at a later date.
EPA Waste Codes:	D001, F001, F003, F005, and U044
Selected Closure Option	Unit removal without onsite treatment
Closure Requirements.	The work effort will include disconnecting electrical, air, and nitrogen lines, tapping low points in the system and draining residual liquids (if necessary), draining and removing the filters, and removing the ancillary piping and pump. The tanks will then be removed, size-reduced in place or moved to a central size reduction facility, and packaged for offsite shipment.
Waste Disposal·	If residual liquids are present, they will be drained or absorbed. The tanks will be disposed as mixed waste. Upon final radiological characterization, the tanks will be packaged to meet the waste acceptance criteria (WAC) of the approved disposal facility. Hoisting and rigging equipment will be used to facilitate transport to a size reduction facility, if necessary. In the event this waste cannot be shipped directly to the approved disposal facility, it will be stored in an approved onsite storage area until shipment can be scheduled.



Building 776/777, SET 61
Pilot Fluidized Bed Incineration System
Pencil Tanks T-1 and T-2
RCRA Unit 49.02

NOTES

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from Supplement to Part B Parmit Applications for subpart BB information, January 1992

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Pencil Tanks T-1 and T-2 B776/777, SET 61

RCRA Unit 49.02

Building 776/777 DOP

11 of 11